



February 6, 2006
VIA ECFS

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

RE: **InterGlobe Communications**
EB Docket No. 06-36
EB-06-TC-060 - Certification of CPNI Filing (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, InterGlobe Communications hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

Carey Roesel
Consultant to InterGlobe Communications

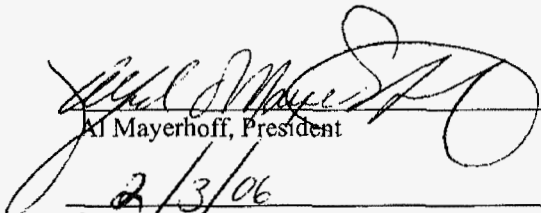
Enclosure

cc: Byron McCoy (byron.mccoy@fcc.gov)
Best Copy and Printing, Inc. (fcc@bcpiweb.com)

**ANNUAL
OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

I, Al Mayerhoff, certify and state that:

1. I am the President of InterGlobe Communications and have personal knowledge of InterGlobe Communications' operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, InterGlobe Communications' operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining InterGlobe Communications' operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



Al Mayerhoff, President

2/3/06

Date

Exhibit A

Statement of CPNI Procedures and Compliance

InterGlobe Communications does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If InterGlobe Communications elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

InterGlobe Communications ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

InterGlobe Communications has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

InterGlobe Communications maintains a record of all sales and marketing campaigns that use CPNI.

InterGlobe Communications maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

CPNI Employee Training

- Each employee is trained to direct all CPNI requests to the Supervisor.
- Each employee is taught to recognize what constitutes as a CPNI request and is made aware of the procedures by signing a document that states the employee has received, read and understands the penalties in regards to the failure to comply with the CPNI request procedures.
- A first offense failure to comply with CPNI request procedures will result in a Formal Written Counseling Record that will remain on the employee's file and/or possible suspension until the investigation has been completed. Employees will then be mandated to retraining on CPNI procedures.
- A second offense failure to comply with CPNI request procedures after the above requirements have been satisfied will result in termination of the employee.

CPNI Outbound Marketing

- In the case of CPNI for marketing purposes each potential account is documented in our database.
- Each potential client must provide a Letter of Authorization signed by the potential client in order to gain any information that may be needed from the potential client in order to evaluate any possibility of future business between InterGlobe Communications and the potential client.
- Each step of the marketing phase is continuously documented in the database and is received by each Account Representatives Supervisor.
- Each Supervisor is responsible for evaluating the steps and received documentation for each Account Representative.
- Once all of the proper written documentation is signed and received from the potential client an Information Request Packet is created.
- The information packet is then submitted to the Account Representatives Supervisor who in turn reviews the packet.
- Once the Supervisor has approved the packet the packet is then sent to Peter Malvasio the CPNI Compliance Officer for final approval.
- Upon approval by Mr. Malvasio the Account Representative is then authorized to proceed with the potential clients authorized requests.

CPNI Requests

- When a request is made for CPNI the information is directed to a Supervisor.
- The Supervisor then contacts the individual issuing the request to finalize the details of that the individual is requesting.
- Once all information is received the account is then noted both in our billing system under said account as well as in an alternate database used for noting accounts in which the Account Representative has full access. All documentation that is received from the requesting party is then scanned into a separate database, which requires a daily back up of all records. The requesting parties documentation is then gathered and placed into a Requesting Party Information Packet.
- The Supervisor then alerts the Account Representative who in turn alerts Peter Malvasio. The packet is sent to Peter Malvasio the CPNI Compliance Officer to verify that all required request material is received.
- Once the request material has been approved the Account Representative then contacts the client to verify the release of all requested information.
- The Account Representative receives written confirmation and authorization from the client to release all requested information. The written confirmation is then added to the request packet.
- Once the client has authorized the request the request is sent back to the initial Supervisor working the request.
- The Supervisor working the request then notes the account that the finalized packet has been sent to Peter Malvasio for approval.
- The information packet is gathered and sent back to Peter Malvasio for approval.
- Upon approval the information packet is then sent to the requesting party and the account is noted that the packet has been released.

All CPNI Requests made for a client of InterGlobe Communications expires 30 days after receipt of the request. In the event that an additional request is made after the 30 day expiration the requesting party must submit a new request which is to follow the same procedures as the initial request provided above. On going CPNI Requests in regards to Consulting Firms contracted for the purpose of internal auditing of an InterGlobe Communications client require a new CPNI Request to be made every 30 days. The CPNI will be provided pending the completion of the InterGlobe Communications CPNI procedures.